

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND
RESPONSE PERIOD TO SECOND AMENDED COMPLAINT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust filed his *Second Amended Complaint* (the “Second Amended Complaint”) [Doc. 120] against the Defendants, including Defendant Miguel Paredes, on May 20, 2025.

2. Defendant Paredes’ deadline to file an answer or other response to the Second Amended Complaint is July 3, 2025. [See Doc. 126.]

3. Plaintiff and Defendant Paredes have commenced settlement discussions. To facilitate those settlement discussions, Plaintiff and Defendant Paredes hereby move the Court, by stipulation, for an order extending the deadline for Defendant Paredes to file an answer or other response to the Second Amended Complaint to July 17, 2025.

Dated: July 2, 2025

/e/ Peter D. Kieselbach

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Dated: July 2, 2025

/s/ Michael L. Scheier

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